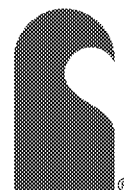


6 October 2021



Mr A. J. Miller
Acting Director
Monitoring, Assistance, and media Programs Division
Office of Compliance
Office of Enforcement and Compliance Assurance
United States Environmental Protection Agency
Washington
D.C. 20460
U.S.A.

Re: A.J.Wells & Sons Ltd Charnwood Skye E700 Non-Catalytic Cord Wood Heater Model;
Certificate of Compliance Number 260-20

Dear Mr Miller,

Thank you for your email and letter of 30th September regarding the Environmental Protection Agency's review of the Certification of Conformity test report for the Charnwood Skye E700 Non-Catalytic Wood Heater Model.

We were most concerned to hear that the review had concluded that the test had not been conducted in accordance with the 2015 Wood Heater Rule and applicable test method. As you will be aware, the test work was carried out and the report compiled by the highly reputable and experienced staff at PFS-Teco on our behalf, and, having had the certificate issued by the EPA back in March last year we were confident that all was well, and in order. We will, of course, address the points you have raised and ensure that they are corrected as soon as possible. With regard to ceasing sales of the product, we are in the perhaps unusual position of not having started production or sale of the product at this moment in time. Due to the Covid-19 pandemic starting shortly after the testing of the product, the start of production was delayed. We will therefore continue to delay production until the points you raise have been addressed and corrected.

Dealing with the specific points raised we would like to raise the following observations and confirm the action to be taken;

- The low burn rate (0.77kg/h) is higher than the medium burn rate (0.75kg/h) recorded in the test report.
 - This is correct and at the time of testing we flagged it up as a cause for concern. However, we were assured that this is quite common, and that the fact that the controls were set to give lower air supply was sufficient. This would be consistent with the directions given in ASTM E3053 Section 8.7 and 8.8. If the letter of the regulation is now being enforced more literally then we will retest and ensure that the requirement is met.
- Missing information – Fuel moisture in the conditioning data
 - We will ensure that this information is included in the test report when re-submitted.
- Missing Information – Conditioning data, air setting.
 - We will ensure that the conditioning data includes the combustion air setting.

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- Missing Information in Non-CBI test report – Firebox dimensions and volume calculation data
 - Firebox dimensions are shown in the CBI test report, the drawings show graphically the firebox volume on drawing no CU000 Sheet 5, the dimensions are shown on sheet 4 of the drawing. The firebox volume is listed in the Non-CBI report.
 - We will put a simplified firebox dimensional drawing together with the calculations for the firebox volume into the Non-CBI report
- Missing Information – Filter Plugging
 - We will ensure that the test report contains explanatory notes if filters are changed due to plugging, and also documentation of leak checks as required.
- Missing Information – Instructions from the manufacturer to the laboratory on the operation of the device.
 - We will ensure that documentation of instruction given to the laboratory on the operation of the device is documented.
- Discrepancy between the test report and the owner's manual – Cordwood test fuel piece length
 - At present the difference is due to the difference between the test fuel length and the maximum practical log length. However, we accept that this is not clear in the manual.
 - We will update the owner's instruction manual so that the text is clarified to be in line with the test report.

In conclusion, we confirm that:

1. We will retest the Charnwood Skye E700 Wood Heater.
2. We will not sell, or advertise for sale, any Charnwood Skye E700 Wood Heaters in the USA or Canada until the appliance has been retested and certified.
3. None of our distributors or retailers in the USA or Canada have any stock of the Charnwood Skye E700, and therefore no sales will be made before the product is retested and certified.

Yours sincerely

A.J. Wells & Sons Ltd



Paul Wells

Technical Director